

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THOMAS M. KELLEY,

Plaintiff,

v.

TOWN OF PLYMOUTH, et al.,

Defendants.

C.A. NO. 05-10596-NMG

**OFFICE OF THE INSPECTOR GENERAL’S MOTION FOR LEAVE
TO FILE AN AFFIDAVIT BY HAND AND NOT ELECTRONICALLY**

Pursuant to Local Rule 5.2 and 7.1, the Office of the Inspector General (“IG’s Office”) respectfully requests leave to file by hand, and not electronically, a copy of the Affidavit of Barbara J. Hansberry (“Affidavit”), was has already been filed by hand on February 12, 2007. On February 7, 2007, the IG’s Office and Plaintiff filed a joint motion asking this Court to order the IG’s Office to produce an affidavit and issue a protective order (“Joint Motion”). In that Joint Motion, the parties explained that the IG remains concerned that the Affidavit contains confidential information. See M.G.L. c. 258; M.G.L. c. 12A, § 13. Thus, the parties respectfully request that this Court allow the Affidavit to be filed by hand in order to preserve its confidentiality until the Court has ruled upon the Joint Motion.

For the foregoing reasons, the IG’s Office respectfully requests that this Court allow it to file the Affidavit by hand and not electronically.

Respectfully submitted,

OFFICE OF THE
INSPECTOR GENERAL,

By its counsel,

MARTHA COAKLEY
ATTORNEY GENERAL

/s/ Christine Baily

Christine A. Baily, BBO #643759
Assistant Attorney General
Government Bureau
One Ashburton Place, Room 2014
Boston, Massachusetts 02108
(617) 727-2200, extension 2617

Date: February 22, 2007

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Pursuant to Local Rule 7.1(a)(2), I hereby certify that I have conferred with Attorney Joseph R. Gallitano, counsel to the plaintiff Thomas M. Kelley, and an assistant to Attorney Jeremy I. Silverfine, counsel to the defendants, Robert J. Pomeroy and the Town of Plymouth.

/s/ Christine Baily

Christine A. Baily, BBO #643759

Assistant Attorney General

Date: February 22, 2007